Department of Environmental Protection

Frequently Asked Questions: myRCRAid & eManifest

Obtaining a Hazardous Waste (HW) Generator Permit and ID (EPA ID)

Q: How do I obtain a HW generator permit and ID?

A: You must apply using the EPA myRCRAid website. For instructions on how to apply for a new permit and ID, <u>click here</u>.

Q: Using myRCRAid, how long will it take me to obtain a new permit and ID?

A: Between one and seven business days.

Q: What if I am not "generating" HW?

A: You are considered a HW "generator" if you are getting HW picked up from your site, even if your waste pick-up is a one-time event.

MV and MP Numbers

Q: May I use an MV plus phone permit ID (e.g., MV6170001111) on a HW manifest in EPA's eManifest system?

A: The MassDEP no longer assigns *new* MV plus phone number format permit IDs. If still accepted by your HW transporter, you may, for the time being, use an existing MV permit ID (issued before June 15, 2018).

However, per Massachusetts Regulations 310 CMR 30.06 a permitted generator must re-notify if there have been any changes to a facility's waste streams, processes, corporate structure, or contacts. If you are using an old MV permit ID, you may need to re-notify through myRCRAid to update your permit information and remain in compliance.

Please be advised that an MV permit ID cannot be used to register as an eManifest user. This means you will not be able to track and manage your shipments electronically or view manifest information online for 90 days, at which point this information will only be available in summary form via a downloadable file from RCRAInfo-Web. For these reasons, MassDEP strongly recommends that you apply for a new permit ID via myRCRAid as soon as possible.

Q: May I use an MP plus phone permit ID?

A: No. "MP" numbers may no longer be used on manifests for HW shipments in Massachusetts.

Temporary and Emergency Numbers

Q: What do I do if I need a permit ID number temporarily?

A: The DEP does NOT issue temporary permits or temporary IDs. If you need a permit and ID for a HW pickup, simply apply for an EPA permit ID, complete the HW pickup, then deactivate the permit and ID when all HW generation has ceased.

Q: I'm a Licensed HW Transporter Responding to an Emergency Spill Incident. What do I use for an EPA permit ID number on the manifest?

A: HW transporters responding to emergency response events can use their own HW permit ID number when completing manifests for wastes from spill sites. <u>Learn more</u>.

eManifest

Q: Do I need to continue mailing copies of my manifests to MassDEP as required at 310 CMR 30.313(4)(b)?

A: The regulation states that for wastes you generate and ship directly to an out-of-state designated facility, you need to submit a photocopy of Copy 3 to MassDEP within 30 days of receiving it from the designated facility. When you use the EPA eManifest system, this requirement will be met automatically since MassDEP will be able to see the manifests online.

Therefore, if you still use an MV number, you should ask your transporters and/or designated facilities for fully executed copies of all manifests and keep them on-site. Please note that neither the transporter nor the facility is obligated to comply with this request. Also, if you are unable to produce a fully executed copy of a manifest within 45 days, you may need to submit an Exception Report to MassDEP (see 310 CMR 30.333).

For these reasons, MassDEP strongly recommends that you apply for a new permit ID via myRCRAid as soon as possible so you can easily track and document your HW shipments.

MassDEP will rescind the regulation at 30.313(4)(b) when it adopts the EPA eManifest rule.

Q: Are HW transporters still required to submit Electronic Monthly Operating Reports (EMORs)?

A: Yes. MassDEP still requires transporters to submit EMORs. eManifest does not track out-of-country shipments or provide all of the information required at 310 CMR 30.407: Reporting.

For More Information

How to Apply for an EPA HW Permit and ID:

https://www.mass.gov/doc/instructions-how-to-apply-for-an-epa-hazardous-waste-id

How to Deactivate an EPA HW Permit and ID:

https://www.mass.gov/doc/instructions-how-to-deactivate-an-epa-hazardous-waste-id

Registration Requirements and Fees for Generators of HW:

https://www.mass.gov/doc/registration-requirements-and-fees-for-generators-of-hazardous-waste

310 CMR 30.000 Massachusetts HW Regulations:

https://www.mass.gov/doc/310-cmr-30000-hazardous-waste-regulations